

# NOTICE

Facilities and Waste Operations

January 24, 2002

Notice No. 0086

## Authorizing Startup and Restart of Laboratory Facilities/Activities

### Purpose

This notice replaces Notice 0053, Confirming Readiness. It updates the information found in 0053 to reflect changes to current LIRs and incorporates recent changes addressing startup and restart of Laboratory facilities/activities to the UC-DOE Appendix G, Work Smart Standards (WSS) set. Specifically, it identifies that DOE 425.1A was replaced by DOE 425.1B; and, that DOE AL SD 425.1B was added to the WSS set. It also highlights the requirement from the AL SD for the Laboratory to submit the first annual startup notification report (SNR) 45 days after accepting the SD (i.e., by April 30, 2002) to DOE/OLASO. Additionally, requirements are identified for Facility & Waste Operations Division to coordinate the submittal of the SNR to DOE/OLASO.

The requirement for preparing and submitting the SNR is contained in draft LIR 300-00-08, Startup/Restart of Laboratory Activities. Information on performing readiness reviews is contained in draft OST 300-00-08, LANL Readiness Review Process. Copies of these documents are available on the FMC homepage <http://arania.lanl.gov/ifmpo/htmls/fmcouncil.html>. Additional guidance is available from FWO-CFS.

**Guidance Note:** The draft LIR and OST are currently being reviewed through the POC review process. When issued this notice will be cancelled.

### Applicability

The provisions of this notice shall apply specifically to those Laboratory managers responsible for authorizing startup of new or significantly modified facilities, restart of facilities after a shutdown, or authorizing of activity-level work (e.g., facility maintenance or a research and development activity).

### Background

As the Laboratory's ISM program has matured, the need for an institutional approach to confirming readiness has become critical to ensure that appropriate levels of readiness reviews are performed prior to authorizing work at the Laboratory. This notice is a compilation of the various elements that make up the overall process by which the Laboratory confirms readiness when authorizing work. The following are contractual requirements that shall be implemented for confirming readiness:

- Federal regulations require the Laboratory to confirm readiness for operations, such as new activities and startup of new facilities. 48 CFR (DEAR) 970.2303-2(a) requires that:  
  
“The conditions and the requirements to be satisfied for operations to be initiated and conducted are established and agreed-upon by DOE and the contractor. These agreed-upon conditions and requirements are requirements of the contract and binding upon the contractor. The extent of documentation and level of authority for agreement shall be tailored to the complexity and hazards associated with the work and shall be established in a Safety Management System.”

- Appendix G (Work Smart Standards Set) of the UC-DOE contract contains the following requirements that shall be implemented for confirming readiness prior to authorizing startup or restart of DOE facilities/activities:
  - DOE O 425.1B, Startup and Restart of Nuclear Facilities, requires that contractors must establish requirements to manage startup and restart actions in accordance with the contractor requirements document contained in the order.
  - DOE AL SD 425.1B, Startup and Restart of Albuquerque Facilities/Activities, provides supplemental requirements to the above order and expands the requirements to address hazardous nonnuclear facilities/activities.
- The Laboratory's Integrated Safety Management (ISM) Description Document (LAUR-98-2837, Rev. 3, Section 6.1, Confirming Readiness) states the following institutional expectation for meeting the DEAR requirement:
 

“Confirming readiness ensures that all necessary actions are complete prior to performing work. Depending upon the hazards, confirmation may range from relatively informal walk-downs by appropriate members of the supervisory chain to formal readiness reviews.....” [Emphasis added]
- LPR 300-00-00, Integrated Safety Management, guiding principle number 8 – Work Authorization, further requires that:
 

“The conditions and requirements to be satisfied for work to be initiated and conducted must be clearly established and agreed upon by DOE and the Laboratory. The extent of documentation and level of authority for agreement must be tailored to the complexity and hazard associated with the work and must be established in a safety management system.”
- Laboratory Implementing Requirements for Activity Level Work Authorization shall be
  - LIR 230-03-01, Facility Management Work Control, and LIR 402-10-01, Hazard Analysis and Control for Facility Work, address the process for authorizing facility work.
  - LIR 300-00-01, Safe Work Practices, addresses authorizing non-facility-related work.
- Laboratory Implementing Requirements for Facility Level Authorization shall be
  - LIR 300-00-07, Nonnuclear Facility Safety Authorization, addresses the requirement that the readiness review process be performed for nonnuclear facilities.

**Guidance Note:** LIR 300-00-07 currently contains a requirement that Notice 0053 shall be followed. This notice supersedes that requirement.

**Guidance Note:** LIR 300-00-06, Nuclear Facility Safety Authorization, has been updated and does not address confirming readiness. Therefore it is no longer listed as a driver for this requirement.

## Required Actions for Meeting the Requirements of this Notice

Responsible Party	Required Actions	Basis <sup>1</sup>
<b>Division Leader</b> (or designee)	• Ensure that readiness reviews are performed prior to authorizing or allowing subordinates to authorize any LANL activities undertaken by the work force under their control, including WFO activities.	2, 7, 10
	• Ensure that readiness review requirements are developed to manage and document readiness reviews for those activities under the division's control, and that review requirements are included in any tenant agreements for facilities managed by the division.	11, 13
	• Ensure that all required startup notification reports are submitted in accordance with DOE O 425.1B, DOE AL SD 425.1B and this notice.	11, 12
	• Ensure that those activities under his/her control that require DOE involvement in the authorization process are identified early in the planning process, and that negotiations with DOE are initiated to define the scope of the involvement and ensure that all DOE requirements for authorization are addressed.	1
	• Ensure that for any nuclear facilities under his/her control the contractor requirements of DOE O 425.1B and DOE AL SD 425.1B are completed.	10
	• Ensure that for any nonnuclear facilities under/his her control that fall under the requirements of DOE AL SD 425.1B, the required readiness assessments are implemented.	
	• Ensure that all prestart findings are closed out prior to authorizing the activities.	6, 11, 12, 13
<b>Facility Managers</b>	• Ensure that prior to authorizing facility-related work to be performed a readiness review commensurate with the level of risk is conducted and documented as part of work control.	2, 5
	• Ensure that prior to startup or restart of a new or modified facility a readiness review, commensurate with the level of risk, is conducted and documented. <b>Guidance Note:</b> This may require DOE involvement and shall be determined prior to startup or restart.	1, 6, 7,
	• Ensure that new tenant activities prior to startup do not violate facility safety envelope requirements.	3
<b>Program and Line Managers/Project Managers and Leaders/Supervisors</b>	• Ensure that prior to authorizing new or modified programmatic work a readiness review, commensurate with the level of risk, has been conducted and documented.	2, 7, 8
	• Ensure that programmatic work requiring DOE approval for initial startup or restart has received a readiness review, including any DOE reviews.	1
	• Ensure that facility management is cognizant of startups and restarts and has confirmed that this is within the authorized facility safety envelope.	3
<b>Employees</b>	• Ensure that prior to starting a new activity the safety and environment responsible person has authorized the activity.	4, 8
	• Ensure that all work requirements are addressed prior to beginning the work.	4, 8
	• Stop any activity that is determined to be unsafe and report to the safety	9

Responsible Party	Required Actions	Basis <sup>1</sup>
	and environment responsible supervisor or manager.	
FWO-CFS	<ul style="list-style-type: none"> <li>Gather information from operating Divisions and compile annual and updated reports.</li> <li>Submit SNRs to DOE/OLASO</li> <li>Provide guidance and training on performing readiness reviews.</li> </ul>	

<sup>1</sup>**Basis:**

- |                             |                          |
|-----------------------------|--------------------------|
| 1. LAUR-98-2837, Sec. 5.5.6 | 9. LIR 401-10-01         |
| 2. LAUR-98-2837, Sec. 6.1   | 10. Work Smart Standards |
| 3. LIR 205-02-02.7          | 11. DOE O 425.1B         |
| 4. LIR 230-03-01            | 12. DOE STD-3006         |
| 5. LIR 230-03-02            | 13. DOE AL SD 425.1B     |
| 6. LPR 270-02-00            |                          |
| 7. LPR 300-00-00            |                          |
| 8. LIR 300-00-01            |                          |

**Precautions**

It is important that the level of review ensures that the authorizing authority has available the information required to make a knowledgeable decision regarding readiness. Therefore, a graded approach must be applied to determine the level of review. This decision must be made using both DOE and Laboratory requirements and guidance and must be commensurate with the hazard to workers, the public, and the environment.

**Guidance Note:** For instance, the authorization for a new office building might only involve a beneficial occupancy inspection, which would include issues such as fire protection and life safety. The startup of a new nuclear facility, however, might involve performance of an initial management self-assessment, followed by a Laboratory operational readiness review, and then another operational readiness review by a DOE team.

**Questions?**

Technical assistance shall be available through the Facility & Waste Operations, Construction and Facility Services Group. Questions should be directed to Jim Grise (FWO-CFS), 7-3607, or Beverly Ramsey (DDL-FWO), 7-3607.

**Los Alamos**  
NATIONAL LABORATORY

*The OIC for this notice is FWO-CFS and the responsible division leader is DL/FWO. This notice is effective on the date of issuance and will remain in effect for 180 days or until these requirements are consolidated in the appropriate LIR(s).*